

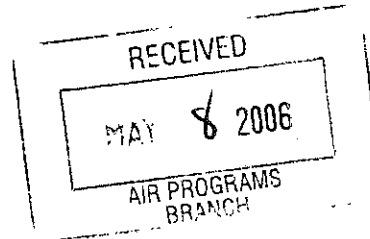
State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary

101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711

May 12, 2006

Pamela Blakley – Permit Section Chief
US EPA Region 5
Air and Radiation Division
77 West Jackson Blvd., AR-18J
Chicago, IL 60604-3590



Subject: Requests for Regulatory Assistance Concerning a Non-Attainment Area Minor Source

Dear Ms. Blakley:

The Department requests USEPA – Region 5 assistance in making a regulatory determination pursuant to non-attainment area permitting under 40 CFR Part 51.165 and the Wisconsin New Source Review SIP (ch. NR 408, Wis. Adm. Code). Specifically, the Department requests assistance in determining the options that may be available to a company that had historically requested and the Department had issued minor NSR permits containing synthetic minor emission limitations when the source proposes a facility expansion and the non-attainment classification of the area in which the source is located has changed.

In a specific situation that has come before the Department, Putzmeister, Inc. (Putzmeister), a manufacturer of concrete pumps and truck mounted concrete boom pumps, has applied for a construction permit. Putzmeister coats metal parts within its facility located in Racine County, Wisconsin. Prior to the revocation of the 1-hour ozone standard, Racine County had been designated as a severe ozone nonattainment area. In 1994, Putzmeister constructed its facility, which included manufacturing and assembly, painting, and equipment testing, under NSR permitting exemption thresholds of 10 tons of VOC emissions per year. Subsequently in 1998, while the area was still classified as a severe nonattainment area under the 1-hour ozone standard, Putzmeister expanded the facility with additional manufacturing capacity, including the addition of several paint booths for which the Department issued a construction permit limiting VOC emissions from the facility to 24.9 tons of VOC per year.

Since the 1-hour ozone standard has now been revoked and Racine County is now considered a moderate nonattainment area under the 8-hour ozone standard, the Department requests your assistance in determining the applicability of NSR to modifications to existing equipment that Putzmeister is now considering. Putzmeister has proposed the modification of its facility which would include the expansion of its manufacturing and assembly operations, the expansion of one existing paint booth, and the installation of one new paint booth. Expansion of the manufacturing and assembly operations will remove a production bottleneck that currently exists for all of the subsequent painting operations. As part of this project, Putzmeister is requesting to restrict allowable facility emissions to 99 tons of VOC per year (eliminating the existing 24.9 TPY emission limitations), but remaining as a minor source under the current 8-hour ozone standard.